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Harrah's Las Vegas, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KARLA K. KWIST, an individual;

Plaintiff,

v.

HARRAH'S LAS VEGAS, LLC, a Nevada
limited liability company; DOES 1 through
10 inclusive; ROE
CORPORATIONS/ENTITIES 1 through
10 inclusive,

Defendants.

Case No.: 2:16-cv-00095-JCM-PAL

**STIPULATION AND ORDER TO EXTEND
DEADLINE FOR PLAINTIFF TO FILE
AMENDED COMPLAINT AND DEFENDANT
TO FILE RESPONSIVE PLEADING TO
AMENDED COMPLAINT (Second Request)**

Defendant Harrah's Las Vegas, LLC ("Defendant"), by and through its counsel of record, Jackson Lewis P.C., and Plaintiff Karla K. Kwist ("Plaintiff"), by and through her counsel of record, The Thater Law Group, P.C., hereby stipulate and agree to extend the time for Plaintiff to file an Amended Complaint for one week, up to and including April 25, 2016, and for Defendant to thereafter file a responsive pleading to Plaintiff's Amended Complaint pursuant to applicable Court Rules.

The parties collectively request this extension for the following reasons:

- On June 5, 2014, Plaintiff dual-filed a charge of discrimination with the Nevada Equal Rights Commission ("NERC") and U.S. Equal Employment Opportunity Commission ("EEOC"). On August 31, 2015, the NERC closed its case. On October 14, 2015, the

1 EEOC issued a right to sue notice, and on January 15, 2016, Plaintiff filed the instant
2 lawsuit (Case 2:16-cv-00095-JCM-PAL).

- 3 • On October 29, 2015, Plaintiff dual-filed a new charge of discrimination with the
4 NERC and EEOC, and requested the immediate issuance of a right to sue notice. On
5 February 4, 2016, the NERC closed its case due to Plaintiff's request for an immediate
6 right to sue notice from the EEOC.
- 7 • On February 26, 2016, the Court granted a proposed stipulation of the parties
8 extending the time for Defendant to file a response to Plaintiff's original complaint, up
9 to and including April 18, 2016, in anticipation of the EEOC issuing a right to sue
10 notice to Plaintiff within the next 30-45 calendar days; thereafter, Plaintiff planned to
11 file an amended complaint to include all of her claims against Defendant in one case.
- 12 • The EEOC has now issued Plaintiff a right to sue notice, and Plaintiff needs a short
13 time to prepare an amended complaint.
- 14 • Plaintiff will amend her complaint to include all of her claims against Defendant,
15 specifically those in her new charge.
- 16 • Defendant's undersigned counsel has been authorized by Defendant to accept service
17 of Plaintiff's amended complaint (once filed).
- 18 • Thus, the parties are requesting a one-week extension of the time for Plaintiff to
19 prepare and file her amended complaint. Thereafter, Defendant's counsel will accept
20 service of the amended complaint and Defendant will file a response to the amended
21 complaint pursuant to Court Rules.

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1 This stipulation and order is sought in good faith and not for the purpose of delay. This is
2 the second request for an extension of time.

3 Dated this 18th day of April, 2016.

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5 THE THATER LAW GROUP, P.C.

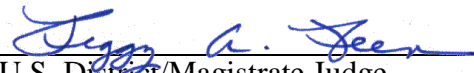
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7 /s/ M. Lani Esteban-Trinidad
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11 **ORDER**

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13 IT IS SO ORDERED _____ April 20, 2016.

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15 
16 U.S. District/Magistrate Judge

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18 4827-3886-8272, v. 1